

Exhibit 2

*JUDGE BATTIS*UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 10/17/2018

*COSTELLO
BATTIS, I.*

BENTHOS MASTER FUND, LTD.,

18 CV 9401
Cas. No.

Petitioner,

- against -

[PROPOSED] ORDER TO SHOW
CAUSE FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

AARON ETRA and
JANE DOE, A/K/A "TRACY EVANS,"

Respondents.

X

Upon the accompanying Petition For Preliminary Injunctive Relief in Aid Of Arbitration, dated October 15, 2018, the supporting Declaration of Gerald Gee-Ho Fong dated October 15, 2018 and the exhibits annexed thereto, and the supporting Memorandum of Law dated October 15, 2018, it is hereby

ORDERED that Respondents Aaron Etra and Jane Doe, a/k/a "Tracy Evans" show cause

before the Honorable Deborah A. Batts, in Courtroom 24B, 500 PEARL ST
 Street, New York, New York, on October 25 at 2:00 AM/PM or as soon thereafter as counsel can be heard, why an order should not be entered granting Petitioner Benthos Master Fund Ltd. ("Petitioner") a preliminary injunction, pursuant to Rules 64 and 65 of the Federal Rules of Civil Procedure, Section 7502(c) of the New York Civil Practice Law and Rules and the Court's inherent powers:

1. Enjoining and restraining respondents Aaron Etra and Tracy Evans and their agents, servants, employees, attorneys, and all persons in active concert and participation with them, from directly or indirectly transferring or continuing to transfer

any portion of the \$5 million previously deposited by Petitioner into Etra's IOLA account pending further order of this Court, or of a duly-constituted arbitral authority, or the written consent of Benthos;

2. Directing respondent Aaron Etra to disclose within 48 hours the following information regarding transfers or disbursements made to date from the \$5 million deposited by Petitioner into Etra's IOLA account:

- a. the recipients of each transfer,
- b. the amount transferred on each occasion,
- c. the written instructions upon which each transfer was made,
- d. any written confirmation received of each transfer,
- e. the bank account information and wire transfer information (if any) associated with each transfer,
- f. the identities, if known to Etra, of any subsequent recipients of Benthos's escrowed funds pursuant to any transfers made of such funds by Etra's transferees, and
- g. the current or last known whereabouts of the said previously-escrowed funds;

3. Further directing respondent Aaron Etra to disclose within 48 hours the following information regarding the identity of respondent Tracy Evans:

- a. any other names by which Evans has identified herself;
- b. her current or last known home address;
- c. her current or last known employer or business with which she has been affiliated, the names of any principals of said entity, and its business address and website;
- d. all telephone numbers known to Etra to have been used by her;
- e. all e-mail addresses known to Etra to have been used by her;

4. Further directing respondent Aaron Etra to, within 48 hours:

- a. provide copies of all communications between and among any of himself, Valkyrie Group LLC, Valhalla Venture Group LLC, Brandon Austin, Hugh Austin, Tracy Evans, "Dmitri," and Ming Hoang Le, or any of their affiliates, representatives and/or agents, concerning the Bitcoin Agreement, the Escrow Agreement, and/or the funds deposited by Benthos into Etra's IOLA account;
 - b. disclose the full name of Dmitri, as well as any other names by which he has identified himself, and his home and business addresses and all of his phone numbers and e-mail addresses known to Etra; and
 - c. disclose the name, address, telephone number, website and identities of principals of any storage company at which any of the funds deposited into escrow by Benthos, or any Bitcoin intended for Benthos, has been held; and
5. Directing respondent Tracy Evans to disclose within 48 hours:
 - a. the full name of Dmitri, as well as any other names by which he has identified himself, and his home and business addresses and all of his phone numbers and e-mail addresses known to her;
 - b. the name, address, telephone number, website and identities of principals of any storage company at which any of the funds deposited into escrow by Benthos, or any Bitcoin intended for Benthos, has been held;
 - c. the identities, if known to Evans, of any subsequent recipients of Benthos's escrowed funds pursuant to any transfers made of such funds by Etra's transferees; and
 - d. the current or last known whereabouts of the said previously-escrowed funds; and

IT IS FURTHER ORDERED that, sufficient reason having been shown therefor, respondents Aaron Etra and Tracy Evans and their agents, servants, employees, attorneys, and all persons in active concert and participation with them, are hereby temporarily enjoined and restrained, pending the hearing of Petitioner's within application for a preliminary injunction, from directly or indirectly transferring or continuing to transfer any portion of the \$5 million previously deposited by Petitioner into Etra's IOLA account; and

IT IS FURTHER ORDERED that the above temporary restraining order shall be effective immediately; and

IT IS FURTHER ORDERED that service of a copy of this Order, together with its supporting papers, upon Etra, by electronic mail delivery to the address from which he has emailed Petitioner and by overnight delivery at his last known business address identified on his website and on file with the Appellate Division, First Department, and upon Evans, by electronic mail delivery to the address from which she has e-mailed Petitioner, on or before October 17,

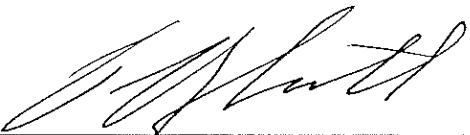
2018, shall be deemed good and sufficient service.

will be posted by Oct 17 at 5pm

Security in the amount of \$ 4,000⁰⁰

Dated: October 15, 2018

4:47 PM



U.S.D.J.

Done, I

J

IT IS FURTHER ORDERED that
ANSWERING PAPERS IF ANY SHALL
BE SERVED BY 5PM OCTOBER 22, 2018
to with a courtesy to Judge Battaglia's Chambers.